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MAIL BRANCH

Technical standards necessary to support this proposal do not address a cost effective method of modifying existing equipment. There is evidence of problems with poor voice quality, tone squelch decoding, data transmission, and tone signaling. Tone signaling is the main method of alerting in public safety communications and replacement of existing equipment would be financially prohibitive.

Considering the many financial and technical reasons for the public safety community to oppose these regulations and potential compromise of the public safety, we request that the commission withdraw this notice of proposed rule making \$92-235.

Sincerely,

Frances C. Morgan

Supervisor

TOWN CLERK AND RECEIVER OF TAXES AND ASSESSMENTS MICHAEL C. ERLANDSON

SUPT. OF HIGHWAYS
MARVIN E. SHELLHOUSE
ASSESSOR
PATRICIA A. EIMERS

INSPECTION OFFICER
ROGER D. ATKINSON

## TOWN OF ELLICOTT

215 South Work Street FALCONER, NEW YORK 14733 Phone 665-5317 Area Code 716 TOWN JUSTICES
EDWARD W. JACKSON
MARILYN C. GERACE
TOWN COUNCIL

CLARENCE E, ELLISON RICHARD J. INMAN NORMAN P. GREEN THOMAS A. ERLANDSON

TOWN ATTORNEY ROBERT W. VAN EVERY

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FCC - MAIL ROOM

March 11, 1993

Ms. Donna Searcy, Secretary Federal Communications Commission 1919 M Street NW Room 222

Considering the many financial and technical reasons for the public safety community to oppose these regulations and the potential compromise of the public safety, I request that the commission withdraw this notice of proposed rule making \$92-235.

Sincerely,

Marvin E. Shellhouse

Highway Superintendent

Marwin E. Skeelionse

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TOWN ATTORNEY
ROBERT W. VAN EVERY

March 11, 1993

Ms. Donna Searcy, Secretary Federal Communications Commission 1919 M Street NW Room 222 Washington, DC 20554

Dear Ms. Searcy,

RE: PR DOCKET NO. 92-235 OPPOSITION TO DOCKET

As an end user of public safety and/or special emergency frequencies, we would like to voice our opposition to "spectrum refarming" as outlined in notice of proposed rule making #92-235. While public safety interests are unique from other spectrum users due to the public safety considerations, this distinction is not addressed in this proposal. Some major points of concern are listed below.

The possibility of having to replace existing equipment and expand the number of transmitter sites puts a tremendous fiscal burden on the governmental entities. These agencies cannot expect to bear this extra financial burden in this time of budget cutbacks.

Power limitations based on height above average terrain and fifty mile separations are not practical in public safety applications where a specific geopolitical area must be covered.

There is no provision for mutual aid and inter agency operations. Such operations form the backbone of emergency communications.

There is also no provision for eliminating potential interference from existing Canadian stations.

The time table for implementation of narrow channel spacing will not be effective unless all stations change system standards simultaneously. This, in reality, is impossible. There are also many questions pertaining to frequency coordinations.



Considering the many financial and technical reasons for the public safety community to oppose these regulations and potential compromise of the public safety, we request that the commission withdraw this notice of proposed rule making #92-235.

Since yeary,

Norman P. Green

Councilman

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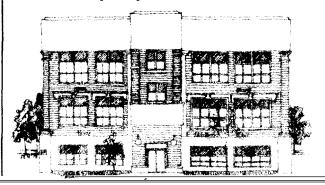
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TOWN CLERK AND RECEIVER OF TAXES AND ASSESSMENTS MICHAEL C. ERLANDSON

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Sincerely,

Thomas A Friandson

Thomas A. Erlandson Councilman

TOWN CLERK AND RECEIVER OF TAXES AND ASSESSMENTS MICHAEL C. ERLANDSON

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larence E. Ellison

Councilman